

## **Exhibit A**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

IN RE: TERM COMMODITIES COTTON : Master Docket  
FUTURES LITIGATION : No. 12-cv-5126 (ALC) (KNF)

:  
:  
:  
:  
:

This Document Relates To: All Actions :

:  
:  
:

-----X

**PLAINTIFFS' RULE 72(a) OBJECTIONS TO MAGISTRATE JUDGE FOX'S  
DECEMBER 16, 2015 ORDER**

## **Table of Contents**

**Filed Under Seal**

# **Table of Authorities**

<i>Anthropologie, Inc. v. Forever 21, Inc.</i> , No. 07 Civ. 7873, 2009 WL 690239 (S.D.N.Y. Mar. 11, 2009).....	14
<i>Catskill Dev., L.L.C. v. Park Place Entm't Corp.</i> , 206 F.R.D. 78, 89 (S.D.N.Y. 2002).....	15
<i>Daval Steel Prods., a Div. of Francosteel Corp. v. M/V Fakredine</i> , 951 F.2d 1357 (2d Cir.1991).....	15
<i>E.E.O.C. v. Morgan Stanley &amp; Co.</i> , No. 01 CIV. 8421, 2004 WL 1542264 (S.D.N.Y. July 8, 2004).....	15
<i>Guzman v. The City of New York</i> No. 10-cv-0653 (S.D.N.Y.).....	18
<i>Hollander v. Am. Cyanamid Co.</i> , 895 F.2d 80 (2d Cir. 1990).....	15
<i>In re Term Commodities Cotton Futures Litig.</i> , No. 12 Civ. 5126, 2013 WL 9815198 (S.D.N.Y. Dec. 20, 2013).....	<i>passim</i>
<i>Laakso v. Xerox Corp.</i> , No. 08-CV-6376, 2011 WL 3360033 (W.D.N.Y. Aug. 3, 2011).....	15
<i>Newman et al v. Herbst, ET Al</i> , No. 09-cv-04313 (E.D.N.Y).....	18
<i>Ni et al v. Bat-Yam Food Services Inc. et al</i> , No. 13 Civ. 7274 (S.D.N.Y.).....	18
<i>Progress Bulk Carriers v. Am. S.S. Owners Mut. Prot. &amp; Indem. Ass'n, Inc.</i> , 2 F. Supp. 3d 499 (S.D.N.Y. 2014).....	1
<i>Schneider v. Fried</i> , 320 F.3d 396 (3d Cir.2003).....	15
<i>Schoolcraft v. City of New York</i> , No. 10 Civ. 6005, 2012 WL 2161596 (S.D.N.Y. Jun. 14, 2012).....	15
<i>TradeWinds Airlines, Inc. v. Soros</i> , No. 08 CIV. 5901, 2011 WL 4949928 (S.D.N.Y. Oct. 18, 2011).....	15
<i>Virgin Enterprises Ltd. v. Am. Longevity</i> , No. 99 CIV. 9854, 2001 WL 237379 (S.D.N.Y. Mar. 8, 2001).....	15













































[illegible]

## CONCLUSION

This Court should sustain Plaintiffs' Objections in all respects. This Court should reverse and/or vacate all of the Order's denials of the relief sought by Plaintiffs.

Dated: New York, New York  
December 30, 2015

LOVELL STEWART HALEBIAN  
JACOBSON LLP

By:

<sup>14</sup> Fed. R. Civ. P 30(b)(1) “The notice must state the time and place of the deposition and, if known, the deponent's name and address.”

<sup>15</sup> Fed. R. Civ. P 30(b)(6) “must describe with reasonable particularity the matters for examination.”

16

Christopher Lovell  
61 Broadway, Suite 501  
New York, New York 10006  
Telephone: (212) 608-1900  
Facsimile: (212) 719-4677  
***Interim Lead Class Counsel***

## **Exhibit A**

**Exhibit Filed Under Seal**

## **Exhibit B**

**Exhibit Filed Under Seal**